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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION

TRACY CAEKAERT and CAMILLIA MAPLEY, )

Plaintiffs, )

vs. ) Case No. CV 20-52-BLG-SPW

WATCHTOWER BIBLE and TRACT SOCIETY )

OF NEW YORK, INC., WATCHTOWER )

BIBLE and TRACT SOCIETY OF )

PENNSYLVANIA, and )

BRUCE MAPLEY, SR., )

Defendants, )

Motions for Sanctions

WATCHTOWER BIBLE and TRACT SOCIETY )

of NEW YORK, INC., )

Cross-Claimant, )

BRUCE MAPLEY, SR., )

Cross-Defendant, )

ARIANE ROWLAND and JAMIE SCHULZE, )

Plaintiffs, )

vs. ) Case No. CV 20-59-BLG-SPW

WATCHTOWER BIBLE and TRACT SOCIETY )

OF NEW YORK, INC., and WATCHTOWER )

BIBLE and TRACT SOCIETY OF )

PENNSYLVANIA, )

Defendants. )

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TRANSCRIPT OF PROCEEDINGS  
Tuesday, April 5, 2022  
9:33 a.m. to 10:44 a.m.

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BEFORE THE HONORABLE SUSAN P. WATTERS  
UNITED STATES DISTRICT COURT JUDGE  
FOR THE DISTRICT OF MONTANA - BILLINGS DIVISION

JAMES F. BATTIN FEDERAL COURTHOUSE  
2601 2nd Avenue North  
Billings, Montana 59101

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Proceedings recorded by machine shorthand  
Transcript produced by computer-aided transcription

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1                    MORNING SESSION, TUESDAY, APRIL 5, 2022

2                    (Whereupon, the court convened at 9:33 a.m., with all  
3 interested parties present and the following proceedings were  
4 had:)

5                    THE COURT: Amanda, would you please call the  
6 matters on the calendar.

7                    THE CLERK: Yes, Your Honor.

8                    The Court has set aside this time to hear the  
9 matters of CV 20-52-BLG-SPW, Caekaert vs. Watchtower Bible and  
10 Tract Society of New York, Incorporated, and in Cause No.  
11 CV 20-59-BLG-SPW, Rowland vs. Watchtower Bible and Tract  
12 Society of New York, New York, Incorporated.

13                    This is the time set for a motion hearing.

14                    THE COURT: Okay. We've also got Watchtower Bible  
15 and Tract Society of Pennsylvania as a defendant in each of  
16 those cases.

17                    All right. Well, I think I know who everybody is  
18 from my cheat sheet that Amanda made for me, but maybe for the  
19 record we'll have counsel identify themselves. So starting  
20 with counsel for the plaintiffs in both cases, if you could  
21 please identify yourselves for the record.

22                    MR. SHAFFER: Morning, Your Honor. Ryan Shaffer.

23                    MR. STEPANS: Good morning, Your Honor. Rob Stepans  
24 on behalf of plaintiffs.

25                    THE CLERK: Are your mics on, Counsel?

1 MR. STEPANS: Oh, I apologize; they're not.

2 THE CLERK: Thank you.

3 MR. STEPANS: Good morning, Your Honor. Rob Stepans  
4 on behalf of plaintiffs.

5 THE COURT: Okay.

6 MR. MURNION: And, Your Honor, this is James Murnion  
7 on Zoom here, just listening in, for the plaintiffs, though.

8 THE COURT: Okay. And then on behalf of Watchtower  
9 New York.

10 MR. WILSON: Your Honor, Jon Wilson here on behalf  
11 of Watchtower New York.

12 THE COURT: Okay. And then on behalf of Watchtower  
13 Pennsylvania?

14 MR. SWEENEY: Chris Sweeney here for Pennsylvania.

15 MR. FAGAN: Good morning, Your Honor. I'm  
16 Gerry Fagan.

17 MR. FITZGERALD: Good morning, Your Honor.  
18 Jordan FitzGerald.

19 THE COURT: Okay. And then I understand Jessica,  
20 the paralegal, is here, too. All right.

21 Good morning, everybody. This is the time set for  
22 hearing on the plaintiffs' motions for sanctions. These  
23 motions -- a motion was filed in each of the two cases.

24 THE CLERK: Sorry to interrupt, did you also make  
25 aware of who else is on Zoom, Mr. --

1           THE COURT: I thought -- oh, yes. Mr. Taylor,  
2 Joel Taylor is on Zoom also.

3           MR. TAYLOR: Good morning, Your Honor.

4           THE COURT: Thank you, Amanda. I apologize.

5           So we're here for the plaintiffs' motions for  
6 sanctions in each of these cases and so who is going to be  
7 taking charge for plaintiffs today?

8           MR. STEPANS: I will, if it pleases the Court, Your  
9 Honor.

10          THE COURT: Okay. Go ahead, Mr. Stepans. Thank  
11 you.

12          MR. STEPANS: May I use the lectern?

13          THE COURT: You may. That's perfectly fine.

14          MR. STEPANS: Your Honor, I suppose as an initial  
15 matter I would -- plaintiffs filed a motion to supplement.  
16 Defendants both objected, but I don't believe I've seen any  
17 briefing on that, so I don't know if the Court wants me to  
18 speak to that motion or speak to the contents of what  
19 plaintiff was attempting to supplement the record with, but I  
20 thought I would introduce that topic.

21          THE COURT: Thank you for reminding me about that.

22          Mr. Wilson, so on behalf of Watchtower New York,  
23 what is the basis of your objection?

24          MR. WILSON: Thank you, Your Honor.

25          The basis of that objection is that the affidavit in

1 issue was dealing with other different issues that are at  
2 issue in this case and whether the statements in the affidavit  
3 do not have any applicability to the present matter, Your  
4 Honor.

5 THE COURT: Okay. And on behalf of Watchtower  
6 Pennsylvania, what is the basis of your objection?

7 MR. SWEENEY: Thank you, Judge.

8 We would echo the comments from New York, and we  
9 will discuss the substance of that affidavit during our  
10 argument to the extent the Court wants us to. I would also  
11 point out that the affidavit is from a representative from the  
12 New York corporation, and we're here for a motion for  
13 sanctions against the Pennsylvania corporation.

14 So to Mr. Wilson's point I do not believe it is  
15 applicable, and it was late filed. We have not had a chance  
16 to respond.

17 THE COURT: Okay. Well, for purposes of this  
18 hearing, I'm going to grant the motion to supplement the  
19 record, and counsel can flesh out their objections or respond  
20 to the arguments that -- and with that I mean defense  
21 counsel -- the plaintiffs' counsel makes this morning.

22 And, of course, I'll take into consideration the  
23 arguments that may go to the weight of the affidavit as it  
24 pertains to these motions for sanctions.

25 So you may proceed, Mr. Stepan.

1 MR. STEPANS: Thank you, Your Honor.

2 Your Honor, it is -- as it pertains to the  
3 Don Adams' supplement and the affidavit, I would suggest that  
4 the Court that the very reasons that the defendant  
5 corporations are objecting are the reason that the Court  
6 should, in fact, consider this affidavit. It's extremely  
7 telling that the affidavit was filed for a different purpose  
8 and that is the substance of our argument.

9 In 1986, Don Adams, who is holding himself out as a  
10 representative of the WTNy corporation, submits this affidavit  
11 and in it makes very specific contentions about the hierarchal  
12 structure of -- in the place in which these two defendant  
13 corporations hold.

14 So in 1986, what Mr. Adams did, and I think the  
15 contents of that affidavit are very telling, Your Honor,  
16 because it's several things. Number one, Mr. Adams makes  
17 assertions that are particular to both WTNy and WTPA and, in  
18 fact, if you look at page -- I point the Court's attention --  
19 this is document 117, page 3 of 7 in the document.

20 And, Your Honor, what's really important about this  
21 affidavit, first of all, it is from the relevant time period,  
22 1986; and the second part is that Mr. Adams not only makes  
23 assertions by way of affidavit that support plaintiffs'  
24 contention that during the relevant time period WTPA was, in  
25 fact, involved in a number of things that would bring them



1 under the purview of this Court for purposes of jurisdiction.

2 But it's not only that, Your Honor, what he does is  
3 point to specific publications. Publications that we have  
4 submitted to this Court. And what Mr. Adams does is pull  
5 quotes from them directly in furtherance of explaining that  
6 hierarchal organization to the Court in Bonham County [sic],  
7 Texas.

8 So it was certainly a different situation, and  
9 certainly there was a different set of assertions that were  
10 being made to the Court in that instance compared to what are  
11 being made in this particular case.

12 So I'd ask the Court to consider when defendant  
13 corporation WTPA says, "Well, we withdrew our motion because  
14 these are archaic texts. They are awkwardly worded. They  
15 build confusion." But in 1986, Don Adams in an affidavit is  
16 quoting verbatim from those same texts in order to tell the  
17 court this is a hierarchal organization with WTPA at the top.  
18 "Those operating under us do not have the sovereignty or  
19 authority to do the things that they are saying."

20 So when they want to hold on to a Kingdom Hall in  
21 1986, those assertions pointing to those documents are in no  
22 way awkward, clumsy, poorly written, or causing confusion;  
23 they are instead being asserted for the certain specific  
24 purpose of having the Court recognize that hierarchal  
25 structure and cement WTPA's ability to maintain control over

1 that physical property because of the control that they had  
2 over the congregations.

3 As I indicated, Your Honor, this page 3 of 7 on  
4 document 117, which is plaintiffs' supplement -- motion to  
5 supplement on the sanctions, we pulled two quotes from this  
6 affidavit. Those quotes, Your Honor, if we were to pull -- if  
7 you go to the next page, page 4, those quotes are pulled  
8 directly from the material -- let's see here, "This is  
9 organized to accomplish our ministry."

10 I'm not sure if this has been filed, but at any  
11 rate, Your Honor, this -- the document "Organized to  
12 Accomplish Our Ministry," which was published by WTPA,  
13 indicates the use of religious corporations -- excuse me. The  
14 quote that Don Adams pulls is from that document.

15 So then now it's awkwardly worded, and the reason  
16 they pulled their jurisdictional motion is because it might be  
17 too confusing for us. I submit to you, Your Honor, this is a  
18 critical piece of information. There is no question that this  
19 affidavit was submitted and the purposes for which it was  
20 submitted were different. So --

21 THE COURT: Can you tell me, in a nutshell, what was  
22 that case about?

23 MR. STEPANS: My understanding, Your Honor, was that  
24 there was a congregation in Bonham County, Texas, that was  
25 attempting to essentially assert control over their -- over

1 that Kingdom Hall. And my understanding is that what they  
2 were trying to -- there was a power play by a congregation  
3 saying these corporations can't -- you know, they aren't in  
4 charge of this.

5 So when WTNY and WTPA came back and said, "No, we  
6 are in control" -- this is a piece of property, basically, so  
7 a Kingdom Hall is the church and the real estate they own  
8 around it. When this local congregation tried to assert  
9 itself as having dominion over that, making assertions that  
10 were not in line with WTPA and WTNY.

11 Those defendant corporations then said, "No, we're  
12 in charge of all of it, and here's how you know: These  
13 publications that we put out in the world, they say exactly  
14 what it is. They say we are at the top and we run the show,  
15 and under us is these 95 branches, and we direct them."

16 Is that -- that's about as much as I know, Your  
17 Honor.

18 THE COURT: Okay. That's in some context for me.

19 MR. STEPANS: Your Honor, the second thing, I guess,  
20 I should address at the front end, and I can do more  
21 comparison, but I think that what I'd ask -- I'll come back to  
22 the Don Adams' affidavit.

23 Let's go to WTPA's response, Your Honor. I do have  
24 to address this because we identified an incorrect document,  
25 and I want to make sure that I -- we did indicate in our

1 brief, our reply brief, that we had indicated an incorrect  
2 document.

3           So our opening brief we were talking about the  
4 Kingdom Ministry coursebook, and WTPA is correct, I mean they  
5 took a lot of umbrage about it, but it was -- they are  
6 correct. That is not a -- the actual document was the source  
7 and the substance of a motion to compel that this Court heard  
8 previously.

9           And that document is the WTPA's 1972 Organization  
10 For Kingdom-Preaching and Disciple-Making. So I apologize to  
11 the Court for making that mistake, but the document in  
12 question, just to refresh the Court's recollection as it  
13 pertains to that motion to compel, James Rowland was deposed  
14 in this case early on, and Mr. Rowland identified the 1972  
15 Organization for Kingdom-Preaching and Disciple-Making as  
16 containing the information that guided and directed him as an  
17 elder in the Hardin congregation during his time there.

18           And it wasn't until after Mr. Rowland identified  
19 that and plaintiff was able to secure it through other means  
20 outside of discovery that WTPA actually turned it over. Why  
21 that's important, Your Honor, is that at the inception of this  
22 case WTPA asked this Court to do two things; they asked the  
23 Court to dismiss the case against them entirely and to  
24 prohibit any discovery from being done at all into that  
25 question.

1           In support of those two aims, WTPA submitted two  
2 items to Your Honor, and those are the affidavits of  
3 Mr. Brumley. It's on the strength of those two affidavits,  
4 and not on anything else, that WTPA asked this Court to  
5 dismiss the case outright and to prevent plaintiffs from doing  
6 any discovery.

7           Subsequent to that, plaintiffs asked for a document  
8 by name in discovery. It was not turned over. And that is  
9 this WTPA's 1972 Organization for Kingdom-Preaching and  
10 Disciple-Making. In a situation like this, Your Honor, where  
11 we're forced to play hide-and-seek, and we have to rely on the  
12 assertions from these defendant corporations, it's almost  
13 impossible to understand how submitting the request to dismiss  
14 these cases, and then dragging us through 18 months where they  
15 are fighting the discovery, not participating, taking  
16 positions that are contrary to their own literature -- and to  
17 be honest, Your Honor, I understand the Rule 11 situation  
18 as -- you know, we couldn't actually put together a Rule 11  
19 letter because we didn't have enough information until  
20 October. So we had been pulled through it for about a year  
21 and a half, asking they dismiss it, asking for the documents,  
22 and to no avail.

23           That's why we're here, because I think we lose track  
24 a little bit of the fact that, you know, my clients, obviously  
25 this is pretty delayed justice for them. And fortunately the

1 opportunity to come bring these cases has been presented. But  
2 here we are, a year and a half, and all we got through is  
3 jurisdictional discovery only to have them dismiss it  
4 summarily without adequate explanation to the Court as to why  
5 the assertions were being made all along by WTPA.

6 In that context, Your Honor, I guess I'd like to  
7 point the Court to -- back to those documents and those  
8 assertions that WTPA made at the front end. So this is  
9 document 18, and this is defendants' reply brief in support of  
10 motion to dismiss for lack of jurisdiction, WTPA page 14 of  
11 17. Okay. And this WTPA says, quote, starting --

12 THE COURT: I'm sorry to interrupt. What  
13 document -- are you talking about a CM/ECF document?

14 MR. STEPANS: Yes, Your Honor. I'm sorry. This is  
15 the defendants' reply brief in support of motion to dismiss,  
16 document 18 -- oh, I apologize. It is --

17 THE COURT: In which case?

18 MR. STEPANS: Let me make sure I've got the right  
19 one. This looks like it's filed in the Caekaert case, Your  
20 Honor. Let me make sure. Oh, no, excuse me. This is  
21 Rowland; document 18 in Rowland.

22 THE COURT: Okay. I have Caekaert up, so give me  
23 just a second.

24 MR. STEPANS: Okay.

25 THE COURT: Okay. I've got it. So direct me to

1 what you're talking about specifically.

2 MR. STEPANS: Thank you, Your Honor.

3 So this is page 14 of 17, and it is the first full  
4 paragraph on that, starting with -- "Starting with plaintiffs'  
5 assertion, jurisdictional discovery is necessary to explore  
6 the full extent of WTPA's involvement," et cetera. WTPA says  
7 this: "The Brumley affidavit affirmatively states that WTPA  
8 has no contact with congregations of Jehovah's Witnesses  
9 located in Montana. Allowing jurisdictional discovery on that  
10 basis would not uncover anything that is already known."

11 So if we look back to Mr. Brumley's affidavit, Your  
12 Honor, the -- this is document 14.1.

13 THE COURT: Yes. I actually have a hard copy of it  
14 here.

15 MR. STEPANS: Okay. And I would ask the Court to --  
16 I'd point the Court's attention to paragraph 11 and paragraphs  
17 14 through 16. Those are affirmative assertions and  
18 representations to this Court. The commentary from WTPA now  
19 is that those are not sanctionable because they are  
20 technically true.

21 The contents of that affidavit, Your Honor, if they  
22 are "technically true" and then omit all of the important  
23 facts, and the corporation asked the Court to dismiss it on  
24 that basis, as we indicated in our briefing, it's either  
25 unbelievably reckless that WTPA wouldn't go into its own

1 documents and find the materials that we've submitted,  
2 including -- and I'll just run through this -- document 96.1,  
3 the *Watchtower* April 1, 1971, indicates that it is published  
4 by the *Watchtower* Bible and Tract Society of Pennsylvania.

5 Document 96-1 at 945, the *Watchtower*,  
6 September 1, 1987, published by Watchtower Bible and Tract  
7 Society Pennsylvania. Document 96-1 at 295, the Kingdom  
8 Ministry School Course 1972, compiled and published by the  
9 *Watchtower* Bible and Tract Society of Pennsylvania.

10 Document 96-1 at 757, the 1975 Yearbook of Jehovah's  
11 Witnesses, corporate publishers, Watchtower Bible and Tract  
12 Society of Pennsylvania.

13 The defendant wasn't trying to get the Court to do  
14 something else. The defendant was trying to get the Court on  
15 the strength of Mr. Brumley to dismiss the case outright on  
16 jurisdictional grounds and not allow any discovery. As a  
17 result, that's either bad faith or it's reckless, and in  
18 either case, plaintiffs -- any plaintiffs -- and, you know, my  
19 clients are no exceptions to that -- should not be subject to  
20 these kind of games in discovery.

21 We should be already probably getting ready for  
22 trial. We should have gone through the discovery by now. And  
23 I would submit to the Court that it wasn't for lack of trying  
24 on the plaintiffs' part. Where we dug up some of this  
25 information that should have been provided to us probably in



1 initial discovery, the efforts that we made, I think there  
2 were seven or eight letters back and forth over the period of  
3 time leading up to the last sanctions hearing that we had.

4 So subject to any questions from Your Honor, I think  
5 our briefing covers the rest of it, but I wanted to cover  
6 those couple items. And subject to any questions, Your Honor,  
7 I guess I'd reserve just a little bit of time to reply if it  
8 would be okay.

9 THE COURT: Sure. And I don't have any questions of  
10 you right now.

11 MR. STEPANS: Thank you, Your Honor.

12 THE COURT: And okay. Mr. Sweeney, you are  
13 representing WTPA. You may go ahead.

14 MR. SWEENEY: Thank you, Judge.

15 As an initial matter, Mr. Stepans, I believe, was  
16 referring to the Rowland case. I probably should have called  
17 him. My references are going to be to the documents in the  
18 Caekaert case. So if you need a second to switch over to  
19 that, my apologies for any inconvenience there.

20 THE COURT: That's okay. Let me get back to  
21 Caekaert. All right. I'm back at the Caekaert case.

22 MR. SWEENEY: Thank you, Judge.

23 I want to spend some time this morning going through  
24 what the plaintiffs actually argued in both their opening  
25 brief as well as their reply. And some of this is -- was

1 covered in our response, but given the gravity of the  
2 situation, I think it's important that we cover these points  
3 in detail.

4 And it's going to become clear, if it hasn't already  
5 from the briefing, that the motion for sanctions has  
6 absolutely no merit, because there has been no attempt to  
7 trick the Court, conceal facts, be deceptive, and all of the  
8 other words that the plaintiffs used to describe the  
9 Pennsylvania corporation's manner in which they have handled  
10 the motion to dismiss.

11 So I want to take a little time to discuss what they  
12 actually argued in their motion. As Mr. Stepan pointed out,  
13 and as the Court is aware, in support of the motion to dismiss  
14 for lack of personal jurisdiction, the Pennsylvania  
15 corporation submitted two affidavits from Mr. Brumley. And  
16 the plaintiffs' claim seems to be that the affidavits contain  
17 a bunch of misrepresentations.

18 And in making this argument in their brief, the  
19 plaintiffs completely misinterpret -- not even misinterpret --  
20 they misquote and misrepresent what Mr. Brumley actually said  
21 in his affidavits, and I think it's important to discuss what  
22 he said.

23 Now, plaintiffs' argument, the first argument they  
24 have, with respect to Brumley's affidavit, plaintiffs claim  
25 that he falsely asserted that WTPA does not publish

1 copyrighted material. Then the plaintiffs point to a  
2 document, which is 21-1 in the Caekaert matter, which is a  
3 printout of a website, to argue that WTPA does, in fact,  
4 publish copyrighted material, and they are, therefore, lying  
5 in Mr. Brumley's affidavit.

6 Here's the problem with that argument. What Brumley  
7 actually testified to was that WTPA does not author the  
8 substantive content or print hard copies of the books,  
9 magazines, brochures, and tracts referred to above. On the  
10 contrary, the copyrighted materials are published by  
11 codefendant Watchtower Bible and Tract Society of New York, a  
12 separate corporation.

13 That's what Mr. Brumley actually said in his  
14 affidavit. Document 21-1, which is the website states that  
15 WTPA is, quote, used by Jehovah's Witnesses to support their  
16 worldwide work, which includes publishing Bibles and  
17 Bible-based literature. Plaintiffs have read this incorrectly  
18 to believe that it states that the Pennsylvania corporation is  
19 publishing the Bibles and Bible-based literature and,  
20 therefore, is lying.

21 The fact is this says "Jehovah's Witnesses and their  
22 worldwide work that includes publishing Bibles and Bible-based  
23 literature." Brumley submitted his second affidavit and  
24 cleared this up. In his second affidavit, which was document  
25 26, he stated, quote, WTPA and Jehovah's Witnesses are not one

1 in the same, and the support WTPA provides to Jehovah's  
2 Witnesses includes owning the copyright to the Bible and other  
3 Bible-based materials and funding international humanitarian  
4 relief matters.

5 This reference to the website that talks about the  
6 Jehovah's worldwide work in publishing Bibles is not stating  
7 that Pennsylvania publishes the Bibles and does not contradict  
8 Philip Brumley's affidavit whatsoever. So their first  
9 argument is flat wrong.

10 We also pointed this out in our brief, and I would  
11 note that in the plaintiffs' reply, they seemed to have  
12 abandoned that argument. They make no mention of it, nor do  
13 they address our counterargument that what this website said  
14 is not contradictory to Mr. Brumley's argument. That seemed  
15 to be abandoned because it was not brought up in the reply.

16 Plaintiffs then move on to point to two letters,  
17 which are document 21-3 and 21-4. And plaintiffs again  
18 misrepresent Brumley's testimony in its affidavits to claim  
19 plaintiffs' version of Brumley's testimony is that Brumley  
20 asserted that "WTPA does nothing more than passively hold  
21 copyrights and provide international humanitarian aid."  
22 That's not what Brumley said. These affidavits are short.  
23 It's not hard to find what he actually said.

24 Plaintiffs then point to some letters to try to  
25 convince the Court that Brumley was lying. Here is what

1 Brumley actually said: "WTPA exists to provide certain  
2 business needs of Jehovah's Witnesses, including, among other  
3 things, holding copyright to books, magazines, songs, and  
4 videos. It also provides international humanitarian aid to  
5 communities after natural disasters."

6 In his affidavit, Mr. Brumley provided examples of  
7 work that WTPA does. He did not purport to provide an  
8 exhaustive list of what WTPA does. Indeed he says they --  
9 WTPA does these things, among other things. And I'm going to  
10 talk in a second what plaintiffs should have done when they  
11 read his affidavit.

12 It's important to note, though, that the plaintiffs'  
13 request for sanctions is continually based on their  
14 misrepresentation of Mr. Brumley's testimony in his affidavit.  
15 They go on to cite a letter, which is 21-3 in Caekaert, to  
16 argue that he is not telling the truth.

17 This is a letter from 1970 from WTPA's past  
18 president, who I understand is now deceased, to an individual  
19 in New York explaining that another person in New York was not  
20 fit to be associated with the Bethal family. This was an  
21 internal communication. It wasn't sent to Montana, has  
22 nothing to do with personal jurisdiction in Montana, and has  
23 -- in no way contradicts what Mr. Brumley said.

24 They similarly cite 21-4 to support their argument.  
25 This is a May 2002 letter from the Pennsylvania corporation to

1 the BBC television network regarding how Jehovah's Witnesses  
2 handle sex abuse matters. Once again, I don't know why this  
3 is cited, but nothing in this contradicts what Mr. Brumley  
4 said in his affidavit nor does it do anything to establish  
5 personal jurisdiction in Montana.

6 And then, briefly, they cite five more letters,  
7 which I'll touch on just very briefly, to claim that  
8 Mr. Brumley is lying, and they are 29-1 through 29-5. In  
9 their argument, they claim that they found additional evidence  
10 to prove that WTPA was lying and to prove that WTPA is  
11 incorrect when it states that it does nothing more than hold  
12 copyrights and provide humanitarian aid.

13 Once again, WTPA and Mr. Brumley have not taken the  
14 position that the only thing they do is hold copyright and  
15 provide humanitarian aid. That is plaintiffs'  
16 mischaracterization of Mr. Brumley's testimony. I've read for  
17 the Court what he actually said.

18 Document 29-1 is a letter from a writing committee  
19 that was signed by WTPA and was sent to Australia. 29-2 is a  
20 letter from WTPA's office in London to elders in England.  
21 29-3 is a 1995 letter that was sent to all elders in the  
22 United States that concerns applying for tuition-free Bible  
23 missionary in New York.

24 29-4 was another letter in England from 1995. And  
25 29-5 is some court filing relating to the Holocaust in

1 retaining -- in gaining compensation for Jehovah's Witnesses.  
2 Beyond me why these things are cited, but plaintiffs argue  
3 that all of these documents we just went through show that  
4 Mr. Brumley is lying. And it doesn't take a very close  
5 examination to show that nothing in these documents  
6 contradicts what Mr. Brumley said in his affidavits.

7 Now, in their reply, the plaintiffs again double  
8 down, and they just say Mr. Brumley's claims -- his testimony  
9 is false. We've explained in our response why that's not  
10 true. They double down, they say it's false, they say it's  
11 misleading. Then they acknowledge that it's technically true,  
12 but they state that it was intentionally crafted to convince  
13 the Court of something that was never true and "to trick the  
14 Court" -- those are the words they use in their brief. That's  
15 not the case because there is nothing in that affidavit that's  
16 inaccurate. There is nothing in that affidavit that's untrue.

17 We have a lot of argument from plaintiffs, but no  
18 evidence to contradict what Mr. Brumley said in his affidavit.  
19 It should also be pointed out, and this cannot be lost on the  
20 Court, if the plaintiffs wanted more information from  
21 Mr. Brumley, other than the two, two-page affidavits he  
22 submitted, they should have deposed him.

23 In fact, in March of 2021, plaintiffs were seeking  
24 to do just that. By then his two affidavits had been filed,  
25 everybody knew what they had said, and plaintiffs had ample

1 opportunity to depose him to get any clarification they  
2 wanted. And, in fact, in September of 2021, we weren't  
3 counsel for the Pennsylvania corporation, but I understand a  
4 deposition for Mr. Brumley was actually noticed by the  
5 plaintiffs and then unilaterally cancelled by the plaintiffs.  
6 They had ample opportunity to clarify anything in his  
7 affidavit and they chose not to.

8           They seem to argue -- plaintiffs seem to argue that  
9 if an opposing affidavit does not contain facts that are good  
10 for them, then the affidavit is subject to sanctions as is the  
11 author.

12           The purpose of an affidavit is to set forth true  
13 facts. It is not meant to be an exhaustive recitation of all  
14 facts the author of the affidavit knows or an exhaustive list  
15 of information the plaintiff wants to know. That is what  
16 depositions are for.

17           THE COURT: Right. But in the context of WTPA's  
18 motion to dismiss for lack of jurisdiction, WTPA was relying  
19 primarily, if not solely, on Brumley's affidavits without any  
20 clarification or supplementation that would be provided to the  
21 Court. The Court obviously doesn't go to depositions, so -- I  
22 haven't mischaracterized that, have I?

23           MR. SWEENEY: No. And Pennsylvania's position is  
24 that there would be nothing learned during a deposition that  
25 would have contradicted or supported an objection to the



1 motion to dismiss. The affidavit was sufficient. The point  
2 I'm making is, based on plaintiffs' argument that it was  
3 misleading and trickery and deceiving because it was  
4 incomplete, they could have certainly talked to Mr. Brumley  
5 and gotten more information from him. Our position is, even  
6 if they had done that, the arguments to dismiss for lack of  
7 personal jurisdiction would still be as strong, but they chose  
8 not to do so.

9 Now, at the beginning of Mr. Stepan's argument, he  
10 pointed to a document that was incorrect in his opening brief  
11 and acknowledged that it was the wrong document, and I think  
12 he said "We've take a lot of umbrage over that." And I want  
13 to touch on that just briefly, because it gets into the  
14 document they actually meant, according to them.

15 They refer to, in their opening brief, which they  
16 admit was the wrong document, a 1990 -- 1972 Kingdom  
17 Ministries School Course Book. And they call this "A  
18 particularly egregious example of WTPA's hiding evidence,"  
19 when in fact WTPA had produced that. It was the first  
20 document they produced in November 2020, plaintiffs had it all  
21 along.

22 But I bring this up because this is a perfect  
23 example of, frankly, the sloppy and unsubstantiated  
24 allegations that the plaintiffs are levying against the  
25 Pennsylvania corporation in support of their motions for

1 sanctions. These arguments are not thought through. And so  
2 in their reply, they change tactics and instead point to a  
3 1972 "Organization for Kingdom-Preaching and Disciple-Making."

4 What Mr. Stepan did not tell you when he explained  
5 to you that WTPA wouldn't produce the document, what  
6 Mr. Stepan didn't tell you was that plaintiffs already had  
7 it. Plaintiffs produced it in January of 2021, before  
8 Mr. Rowland was deposed, and then after the deposition it was  
9 produced back to them by the Pennsylvania corporation.

10 The Court will recall that as part of the  
11 jurisdictional discovery, there was an order from the Court  
12 limiting discovery about the corporate relationship from 1973  
13 to either 1992 or 1995. This book was obviously outside of  
14 that window. So there was a disagreement as to whether this  
15 document was produced.

16 But the important part here, the plaintiffs already  
17 had it, and ultimately it was produced by the Pennsylvania  
18 corporation anyway so it was produced twice, and that was not  
19 acknowledged to you by the plaintiffs.

20 THE COURT: Well, they did say they had it before  
21 the Rowland deposition but not from WTPA.

22 MR. SWEENEY: Right, they did collect it. Okay.  
23 And if they said that, my apologies.

24 THE COURT: They did say that.

25 MR. SWEENEY: I just wanted to be clear, that they

1 had it, there's been no prejudice to them, and, of course, the  
2 reasonable and valid reason why it wasn't produced was because  
3 of the Court's order that Pennsylvania understood to believe  
4 that this document was outside of the discovery window.

5 THE COURT: So what -- why -- when was this  
6 organization document? When was that published?

7 MR. SWEENEY: 1972 is my understanding.

8 THE COURT: Okay. So the year before the window?

9 MR. SWEENEY: Correct. And I'm not really sure  
10 about the importance of this book anyways. My understanding  
11 is this book went to all Jehovah's Witnesses to acquaint them  
12 with how congregations work. It was disseminated by the New  
13 York corporation, not the Pennsylvania corporation. It  
14 plainly states on the front of it that PA, the Pennsylvania  
15 corporation holds the copyright, but New York published this.

16 It's not clear why we are even talking about that  
17 book because there is nothing in that that either contradicts  
18 Mr. Brumley's testimony or that really establishes personal --  
19 I don't see how there is a connection between the personal  
20 jurisdiction of Pennsylvania and this book.

21 Now, let's keep in mind what we're doing here, the  
22 plaintiffs are asking for sanctions against both Mr. Brumley  
23 and Mr. Taylor. They throw Mr. Taylor in the mix, and I'm not  
24 sure why. The way I understand their argument, he was an  
25 attorney, he should have recognized that Brumley's affidavit

1 was full of lies and, as an attorney, should have corrected  
2 them. As I've spent time discussing and I argued in our  
3 response, there is nothing inaccurate in Mr. Brumley's  
4 affidavit.

5 But Mr. Taylor's actions in this matter have been  
6 extremely limited. He appeared pro hac, he appeared at the  
7 deposition, and he's appearing at this hearing. In their  
8 briefs, they seem to argue that because Mr. Taylor was  
9 involved in some other cases involving the New York  
10 corporation, he should have taken that knowledge and corrected  
11 misstatements in Brumley's affidavits. We have covered this;  
12 there was no misstatements.

13 But the other lawsuits didn't involve WTPA. They  
14 didn't involve Mr. Brumley. And the only one that involved  
15 Mr. Taylor was the Nunez case. Plaintiffs have failed to  
16 establish how Mr. Taylor's involvement in another case  
17 representing another party is a basis for sanctions in this  
18 case, especially since they have been unable to identify any  
19 sanctionable conduct in the first instance. So we're  
20 scratching our head as to Mr. Taylor, because that's our  
21 position with respect to him.

22 Now, this Don Adams' affidavit -- Judge, at the  
23 beginning of this, I understand you granted the motion to  
24 supplement, and I think I may have heard you say that we can  
25 flesh out our objections later. Did you want me to state our

1 objections, even though you've already granted it, or should I  
2 just talk about the substance?

3 THE COURT: Well, I thought if you wanted to make  
4 further argument on your objection for purposes of the record,  
5 you could or we can just -- I have granted the motion and so  
6 if you wish to just get into the substance, you can do that,  
7 too.

8 MR. SWEENEY: Well, let me just make our record  
9 then. So our objection, of course, it was late filed. We  
10 have not had an opportunity to respond to it. We have not had  
11 an opportunity to talk to Mr. Adams -- I don't even know if  
12 Mr. Adams is alive. And Mr. Adams was, as he testified in his  
13 affidavit, a representative of the New York corporation, not  
14 the Pennsylvania corporation.

15 Nowhere in his affidavit does he claim to have  
16 personal knowledge of the Pennsylvania's corporation business  
17 or how it does business. And we don't even know what the  
18 purpose of that affidavit was. Mr. Stepans' understanding of  
19 the case is similar to mine, it was 40 years ago almost.

20 So we aren't all sure even what the case was about.  
21 We don't even know what the purpose of the affidavit was. So  
22 to cherry-pick an affidavit from somebody we don't have a  
23 chance to talk to and was late filed we believe is improper  
24 and should not be considered by the Court.

25 Now as to the substance of Mr. Adams' affidavit, I

1 don't see how that pertains to the motion to dismiss for lack  
2 of personal jurisdiction. He, again, claims that the church  
3 is hierarchal, but there is no legal relationship between the  
4 New York corporation and the Pennsylvania corporation.

5 We've produced all the corporate records going back  
6 to the 80s. There's no legal relationship between the two.  
7 So it's not clear how Mr. Adams' affidavit in a Texas case  
8 somehow shows that Pennsylvania corporation is subject to  
9 personal jurisdiction in Montana.

10 So all we have to say about that is that it seems  
11 completely irrelevant and other than our objections, we'll  
12 leave it at that.

13 THE COURT: Okay.

14 MR. SWEENEY: I want to talk about the law for a  
15 minute. In particular, I want to start with Rule 11. So it's  
16 clear that WTPA withdrew its motion to dismiss and took  
17 advantage of the safe harbor provision of Rule 11.

18 Last fall the plaintiff sent a letter to the  
19 Pennsylvania corporation and threatened sanctions under Rule  
20 11, specifically under Rule 11, if the motion was not  
21 withdrawn. They invoked the 21-day safe harbor provision.

22 That safe harbor provision provides that a motion  
23 for sanctions cannot be filed under Rule 11 if the challenged  
24 filing is withdrawn within 21 days after being provided notice  
25 of the intended motion for sanctions. And as we pointed out

1 in our brief, the advisory committee states the safe harbor  
2 protects a party against a motion for sanctions if the  
3 challenged paper is withdrawn.

4 Now, plaintiffs' counsel specifically said they were  
5 going to file a motion for Rule 11 sanctions if the motion to  
6 dismiss was not withdrawn. Relying on plaintiffs'  
7 representations and the safe harbor rule, Pennsylvania  
8 corporation did withdraw the motion. This was not an  
9 admission that the motion was without merit.

10 Pennsylvania corporation believes the motion had  
11 merit. They have good-faith arguments that they are not  
12 subject to jurisdiction in Montana; however, when they were  
13 faced with an uncertain ruling on that motion, as well as a  
14 threatened Rule 11 motion for sanctions, the decision was made  
15 to withdraw the motion and move forward on the merits.

16 And they did so, knowing that they would be --  
17 Pennsylvania corporation would be protected from sanctions  
18 under Rule 11 which was as represented by the plaintiffs.  
19 Then as soon as that motion was -- as soon as the motion to  
20 dismiss was withdrawn, the plaintiffs filed a motion for  
21 sanctions anyways under 28 U.S.C. 1927 and the Court's  
22 inherent power to sanction.

23 Their Rule 11 threat was simply a Trojan horse to  
24 trick Pennsylvania corporation to withdraw the motion and ask  
25 for sanctions anyways. They concealed they were going to do

1 that. When they asked for Rule 11 sanctions or told  
2 Pennsylvania they were going to do that, there's no mention  
3 that a motion for sanctions would be filed regardless whether  
4 the safe harbor provision was utilized.

5 So they allowed the Pennsylvania corporation to  
6 withdraw the motion, and then they sprung their motion for  
7 sanctions on them anyways. And the basis for the sanctions  
8 they now seek are exactly the same as they claimed they were  
9 going to seek under Rule 11. It's not -- it's bad faith to  
10 invoke Rule 11, let somebody withdraw a motion, and file a  
11 motion for sanctions anyway, and the Court should not tolerate  
12 this.

13 Frankly, it would defeat the safe harbor provision.  
14 Rule 11 allows parties to withdraw challenged papers that may  
15 run afowl of the rule by giving them the protection of the  
16 safe harbor. The Ninth Circuit says this must be strictly  
17 followed. It's very simple. Why would a party ever withdraw  
18 a challenged paper under Rule 11 if they were going to face  
19 sanctions anyways?

20 Especially, as the plaintiffs have done here, the  
21 withdrawal of the motion is going to be used to support a  
22 request for sanctions later. And that's what the plaintiffs  
23 have done here. They said, "Withdraw your motion to dismiss  
24 or file Rule 11." We said, "All right. We'll take advantage  
25 of the safe harbor."



1           We withdraw. They filed the motion for sanctions  
2 anyways, and then argue the fact that we withdrew the motion  
3 as evidence that the motion didn't have merit in the first  
4 place. That would completely defeat Rule 11 safe harbor, if a  
5 party can invoke it and be sanctioned for it anyways as well  
6 as using the withdrawal of the motion to support the motion  
7 for sanctions under 1927 or the Court's inherent powers. The  
8 safe harbor was utilized. That should be the end of the  
9 question. And on that basis alone, the motion for sanctions  
10 should be denied.

11           Now, the plaintiffs also make the argument that  
12 Mr. Brumley and Mr. Taylor should not get the benefits of the  
13 safe harbor. And the language of Rule 11 defeats this  
14 argument. Rule 11 applies to those who present to the Court a  
15 pleading, written motion, or other paper, or someone who later  
16 advocates for one of those things.

17           Obviously, Mr. Brumley signed an affidavit, and  
18 that's a large part of the plaintiffs' allegations. With  
19 respect to Mr. Taylor, they argue that he advocated for it by  
20 not correcting it. Rule 11 doesn't just apply to those who  
21 sign papers, and neither does the safe harbor.

22           Plaintiffs seem to argue that there is a group of  
23 attorneys that can be sanctioned under Rule 11 but aren't  
24 entitled to the protection of the safe harbor, and that's  
25 obviously not the case. They threatened sanctions against

1 Mr. Brumley and Mr. Taylor under Rule 11, they invoked that  
2 process, and Mr. Brumley and Mr. Taylor are likewise entitled  
3 to the safe harbor of Rule 11.

4 Now, with respect to the Court's inherent power to  
5 sanction as well as 1927, the plaintiffs hope the Court  
6 ignores the safe harbor, Rule 11, and just sanctions them  
7 anyway, but neither of those are applicable. The standard for  
8 sanctions under both the Court's inherent power and 1927 are  
9 similar. The Ninth Circuit has said that sanctions may be  
10 awarded when a party is acting in bad faith, vexatiously,  
11 wantonly or oppressive reasons.

12 Under 1927 an attorney may be sanctioned if the  
13 attorney multiples proceedings unreasonably and vexatiously.  
14 Both essentially require a finding of bad faith, and bad faith  
15 is warranted or found when an attorney knowingly or recklessly  
16 raises a frivolous argument or argues a meritorious claim for  
17 the purposes of harassing an opponent. Neither are the  
18 case -- neither is the case here.

19 Pennsylvania corporation filed a motion to dismiss.  
20 It's true that they objected to jurisdictional discovery, but  
21 I'm sure as this Court knows, and I think all the attorneys in  
22 the room know too, it is common and probably usually the case  
23 that when jurisdictional discovery is sought, the opposing  
24 party objects to such request.

25 Objecting to jurisdictional discovery is not bad

1 faith. Similarly, as we have spent some time this morning  
2 discussing and as is in our brief, plaintiffs have not pointed  
3 to anything that Pennsylvania corporation has stated that is  
4 inaccurate, untrue, misleading, deceiving, or trying to trick  
5 the Court.

6 The bottom line is, Your Honor, when it comes back  
7 to the Brumley affidavit, which seems to have been the thrust  
8 of the argument here, the plaintiffs chose not to depose him.  
9 And had they wanted clarification of what he said, they  
10 certainly could have done that and supplemented their record,  
11 and they chose not to do so.

12 Mr. Brumley has not said anything untrue.  
13 Mr. Taylor certainly hasn't said anything that's untrue.  
14 Pennsylvania corporation has not acted in bad faith  
15 whatsoever. And so we would submit that the motion for  
16 sanctions should be denied at a minimum because the safe  
17 harbor Provision of Rule 11 was complied with, but even if the  
18 Court were to get beyond that, there is no bad faith by  
19 Pennsylvania corporation. The motion to dismiss was made in  
20 good faith, and the motions for sanctions should be denied.

21 THE COURT: Thank you, Mr. Sweeney.

22 And I assume, Mr. Wilson, you're just here  
23 representing your client; you don't have anything to argue  
24 particularly.

25 MR. WILSON: Correct, Your Honor.

1 THE COURT: Okay. Thank you.

2 Mr. Stepans, you may rebut.

3 MR. STEPANS: Thank you, Your Honor.

4 MR. WILSON: Your Honor, sorry to interrupt. It  
5 looks like maybe Joel has something to say.

6 THE COURT: Okay. Well, I'll let him speak before  
7 you rebut, Mr. Stepans.

8 MR. STEPANS: Sure.

9 THE COURT: Go ahead, Mr. Taylor.

10 THE CLERK: Mr. Taylor, do you have something to say  
11 to the Court?

12 MR. TAYLOR: We lost audio for a second at the  
13 speaker lectern but I can hear you fine.

14 THE CLERK: Okay.

15 THE COURT: Okay. So is that just what you wanted  
16 to tell us, Mr. Taylor, what that you'd lost audio?

17 MR. TAYLOR: Yes, Your Honor. Of course if the  
18 Court has any questions for me, I'm available to answer them  
19 as the Court wishes also.

20 THE COURT: Okay. Thank you. I don't have any  
21 questions of you at this time.

22 Mr. Stepans.

23 MR. STEPANS: Thank you, Your Honor.

24 Your Honor, on the publishing as it pertains to the  
25 affidavit of Mr. Brumley, so if we go back to Mr. Brumley's

1 affidavit, this is, let's see, paragraphs 14, 15, and 16.

2 THE COURT: And that's document 14-1, correct?

3 MR. STEPANS: That is correct, Your Honor.

4 THE COURT: Okay.

5 MR. STEPANS: Those three, in particular No. 15,  
6 "WTPA does not author the substantive content or print hard  
7 copies of the books, magazines, brochures, and tracts referred  
8 to above." So, I mean, I did not concede that this was  
9 technically true.

10 Defendants are saying it's technically true. I'm  
11 saying it could technically be true that that at this moment  
12 in time is accurate, but that it has nothing to do with the  
13 substance and contents of this case.

14 So if that's just an informative piece of  
15 information that they would like to give to the Court that has  
16 no bearing whatsoever on the question of jurisdiction as it  
17 pertains to the facts that are present in this case, I submit  
18 to you, Your Honor, that that is bad faith. There is no other  
19 reason to submit it to you.

20 The Brumley affidavit -- let's see, so once again,  
21 document 14-1, and this is paragraph 13, "WTPA exists to  
22 provide certain business needs of Jehovah's Witnesses  
23 including, among other things, holding copyrights, et cetera,"  
24 and then it goes on to explain. What does that have to do  
25 with this case?

1           If we're supposed to go depose Mr. Brumley and find  
2 out the nature of all those things, why are they submitting  
3 that to you, Your Honor, if not to tell you that WTPA doesn't  
4 do what we're saying, it does something else.

5           Mr. Brumley's affidavit, paragraph 10, "WTPA has no  
6 contact with congregations of Jehovah's Witnesses located in  
7 Montana." If we could go back to the documents I referenced,  
8 which I didn't hear Mr. Sweeney refer to, and those are  
9 documents 96-1 that I read out loud.

10           Each one of those indicates that those are published  
11 by WTPA. By extrapolation, the assertion is made that these  
12 materials are used and disseminated in order to provide  
13 direction to the congregants and the elders. That's the  
14 assertion that has been made, that they go out worldwide.

15           I submit to you, Your Honor, that when Mr. Brumley  
16 says that, quote, WTPA has no contact with congregations of  
17 Jehovah's Witnesses located in Montana, that is not an  
18 accurate statement based on the materials that we have, the  
19 documents that indicate unequivocally that WTPA published them  
20 straight up, and those are 96.1 that I referred to.

21           Document 96.1 at 11 -12 is WTPA's articles of  
22 incorporation as amended in 1945. Those articles appear to  
23 still be in play and certainly they comport with what  
24 Mr. Adams said in 1986. In the articles of incorporation, and  
25 I'll quote just a few, Your Honor, because I think this is

1 pretty important language in the context of Mr. Brumley's  
2 affidavit:

3 "The purposes of this society are to act as the  
4 servant legal worldwide governing agency for the body of  
5 Christian persons known as Jehovah's Witnesses." Goes on to  
6 many other things, including "to print and distribute Bibles  
7 and to disseminate Bible truths in various languages by means  
8 of making and publishing literature containing information in  
9 common explaining Bible truths and prophecies. To authorize  
10 and appoint agents, servants, employees, teachers,  
11 instructors, evangelists, missionaries" -- okay.

12 We go on -- let's see, "To establish and maintain  
13 private Bible schools and classes, to provide and maintain  
14 homes, places, and buildings for gratuitous housing of such  
15 students, lecturers, teachers, ministers. To support,  
16 maintain, and send out to various parts of the world Christian  
17 missionaries, teachers, and instructors in the bible and Bible  
18 literature." So they do all of these things; and Mr. Brumley  
19 says they basically do nothing, they just hold on to the  
20 copyrights.

21 Again, Your Honor, I would go back to reckless or  
22 bad faith. I want to be honest, I had no hope that this  
23 motion would be pulled out under Rule 11, but I don't know  
24 what to do other than come to the Court and ask for sanctions  
25 in this situation, Your Honor.

1           As we laid out in our brief, where two affidavits  
2 are filed, and it is on the strength of those affidavits --  
3 not some other explanation, not some other extenuating  
4 circumstances, not some additional information -- it's on the  
5 basis of the assertions in that that they ask to be dismissed  
6 outright and for us not to do any discovery.

7           The 1972 document, if the Court recalls, and  
8 Mr. Sweeney's firm was not in the case at that point in time,  
9 but if you remember, we held a motion to compel hearing. The  
10 evidence was clear that the 1972 document was, in fact, being  
11 used well beyond 1973, into the 80s, in the Hardin  
12 congregation.

13           By all accounts there was not a new edition that was  
14 turned out in '73 or '74 and so that was the document that was  
15 in play at that point in time in Hardin, and it fell within  
16 that timeframe.

17           Your Honor, going back to Mr. Adams' affidavit,  
18 this -- and so Mr. Adams' affidavit in our motion to  
19 supplement, if you would -- if I could point the Court's  
20 attention to paragraph 6.

21           THE COURT: Of the affidavit or your motion?

22           MR. STEPANS: Of the affidavit, Your Honor, I'm  
23 sorry.

24           THE COURT: Okay. I'm there.

25           MR. STEPANS: Okay. "To implement their decisions



1 the governing body uses a hierarchal organization together  
2 with corporate entities when appropriate to accomplish it's  
3 worldwide work of teaching and declaring the good news," et  
4 cetera, et cetera.

5 "The principal corporation used by the governing  
6 body is the Watchtower Bible and Tract Society of  
7 Pennsylvania." Paragraph 7, under the *Watchtower* Bible and  
8 Tract Society of Pennsylvania the governing body directs 95  
9 branches through branch committees that report their progress  
10 to the governing body and implement the directives in a  
11 uniform manner.

12 Here the cite is very important, Your Honor. He  
13 cites to "see organized to accomplish our ministry, pages 26  
14 and 27." I'll go to those. "This is organized to accomplish  
15 our ministry." It is a WTPA document, Bates 028731 through  
16 028954. Take the Court to page 26, so this was -- 26 and 27.  
17 This is what Mr. Adams cites to.

18 THE COURT: Is that document filed in the Court  
19 record?

20 MR. STEPANS: I do not believe it is, Your Honor.  
21 The quote is -- the excerpts are via Mr. Adams' affidavit and  
22 our supplement, so these excerpts -- I'm going to go a little  
23 beyond it, if that's okay with Your Honor, it's to continue  
24 this sentence. Okay.

25 Under -- this is page 26 and the heading is, "Use of

1 Religious Corporations. It has proved to be the course of  
2 wisdom for the faithful slave to organize certain corporations  
3 that are recognized by the laws of various countries. These  
4 religious corporations own and operate printing facilities  
5 that produce and distribute Bibles and Bible literature on a  
6 worldwide basis for use in the Kingdom Ministry.

7 "The first in time and the principal corporation  
8 used in this way is the *Watchtower* Bible and Tract Society of  
9 Pennsylvania. The *Watchtower* Society has extended its works  
10 worldwide, establishing branch offices in various countries.

11 "Also in compliance with local government  
12 regulations, a number of other religious societies have been  
13 legally formed, such as Watchtower Bible and Tract Society of  
14 New York and the International Bible Students Association.

15 "All these legal instrumentalities cooperate with  
16 one another. These and other legal corporations are used by  
17 the modern-day governing body of Jehovah's Witnesses to  
18 facilitate the preaching of the good news worldwide and care  
19 of the spiritual needs."

20 Your Honor, in 1986, Mr. Adams asserts to the Court,  
21 unequivocally, that that's the hierarchal structure of this  
22 organization, that WTPA is the first in line, that all of them  
23 look to WTPA. Those are the assertions from Mr. Adams. He's  
24 quoting from the material that we have asserted is exactly the  
25 basis for the jurisdiction -- for jurisdiction to be

1 appropriate.

2 As it pertains to Rule 11, Your Honor, and the  
3 request for sanctions, I have to be honest, I did not -- I  
4 told Your Honor that I don't like to be in here on discovery  
5 disputes, and I think you may at some point not believe me  
6 because here we are again.

7 But in a situation such as this, where we are so  
8 reliant on the good faith of defendants to come forward with  
9 this information where they have asked this Court to rely on  
10 these affidavits, without question, in order to dismiss the  
11 case, prevent us from doing discovery, and finding these  
12 facts, it's my position that as a result of that -- because  
13 they ask the Court to do that, because they obstructed  
14 discovery, because we're 18 months in, that I don't know what  
15 the proper sanction would be exactly, but I am in a position  
16 to come here and ask the Court whether it is appropriate  
17 because based on everything that I've seen, it can only be  
18 recklessness or bad faith that leads us to where we're at  
19 right now as opposed to getting ready for trial.

20 So with respect, Your Honor, and subject to any  
21 other questions, I submit this to the Court reluctantly in  
22 this fashion, but without any other option as to how to know  
23 that we are going to be able to proceed in this case and rely  
24 on the representations that are made from these corporations.

25 Thank you.

1 THE COURT: Thank you.

2 Well, I will deem the motion submitted, and  
3 Mr. Taylor's got his hand up again.

4 MR. TAYLOR: Your Honor, if I might have just two  
5 minutes of the Court's time?

6 THE COURT: All right. Go ahead.

7 MR. TAYLOR: As Your Honor is aware, prior to the  
8 current law firm representing the Pennsylvania corporation,  
9 both corporations were represented by the same counsel. My  
10 understanding is that the publications cited in the Don Adams'  
11 affidavit were produced to plaintiffs' counsel, along with  
12 about 70,000 other pages of documents.

13 And to the uninformed, Mr. Adams' affidavit could be  
14 misunderstood. Mr. Adams is talking about both about the  
15 religious structure of the faith and also the corporate  
16 structure.

17 In the religious structure of the faith, he  
18 describes a hierarchy. And he says that "There is a religious  
19 governing body which is not one in the same as the board of  
20 directors." And then he also describes "branches which are  
21 religious constructs, not corporate constructs."

22 Interestingly, if plaintiffs' counsel had kept  
23 reading in the Don Adams' affidavit, it would explain in the  
24 very following paragraphs that the New York corporation is the  
25 corporation responsible for interaction with Jehovah's

1 Witnesses in the United States. It's the very next paragraph  
2 in that affidavit, but he doesn't refer to it because it's  
3 inconvenient.

4 But it's distinction between the religious and  
5 corporate that it's confusing. And on behalf of the New York  
6 corporation, it has not contested jurisdiction, and indeed,  
7 the documents that were produced by the Hardin congregation,  
8 the actual congregation in Montana, all refer back to the New  
9 York corporation.

10 In fact, the letter that formed the corporation for  
11 the Hardin congregation is indeed a New York letterhead. It  
12 is not a Pennsylvania corporation. And so this confusion that  
13 arises between the religious construct and the corporate  
14 construct is why we have this confusion. Never has there ever  
15 been an attempt to engage in any bad faith, and certainly I  
16 have never made any representations to this Court other than  
17 the one that I'm making right now.

18 That's all I have to say, Your Honor. Thank you for  
19 hearing me.

20 THE COURT: Well, what difference would it make for  
21 personal jurisdiction of WTPA and this Court whether the  
22 contacts that WTPA had with the State of Montana were through  
23 some religious sort of structure or hierarchy or through a  
24 corporate structure?

25 MR. TAYLOR: In fact, Your Honor, it hasn't been

1 WTPA that's been having those contacts. The challenge that  
2 plaintiffs' counsel is trying to understand is where the  
3 Pennsylvania corporation sits. And it keeps referring to a  
4 hierarchy, but the hierarchy is not on the corporate side.

5 The hierarchy represents how the religion is  
6 structured, not how the corporation is structured, which is  
7 why the corporation records don't show anything to suggest  
8 that NY is a subsidiary, a child, or a parent for any  
9 corporate relationship between the entities because none  
10 exist.

11 And so it is -- that's in part, Your Honor, why the  
12 motion was withdrawn. We understand that when you are looking  
13 at a religion and then these corporations, it is entirely  
14 confusing. It's understood. But we would be pleased to have  
15 the opportunity to bring these facts to bear through  
16 deposition and discovery, and then the Court can assess it at  
17 the conclusion of discovery to see whether or not Pennsylvania  
18 has any contacts, meaningful contacts, with any congregation  
19 in Montana let alone the allegations related to the complaints  
20 at issues here.

21 THE COURT: Well, there would be no need for that,  
22 the motion has been withdrawn, so there'd be no need for  
23 further discovery on it. I don't know that you answered my  
24 question, particularly, Mr. Taylor, about what difference it  
25 would make whether WTPA had influence over, for example, the

1 Hardin congregation with regard to religious sort of  
2 activities or through some more corporate kind of aspect as  
3 far as jurisdiction goes.

4 MR. TAYLOR: To be clear, Your Honor, the  
5 Pennsylvania corporation had no religious authority, control,  
6 influence over the Hardin congregation to the extent one would  
7 argue, and I would rebut that argument, that the  
8 Pennsylvania -- or the New York corporation had that  
9 relationship, I think those facts would be borne out during  
10 discovery.

11 THE COURT: Okay. Thank you, Mr. Taylor.

12 Mr. Stepans, did you have anything you wish to say  
13 with regard to Mr. Taylor's comments?

14 MR. STEPANS: No, I don't believe so, Your Honor.  
15 Thank you.

16 THE COURT: All right. Okay. So I think everyone's  
17 had an opportunity to be heard, I hope so. So as I was  
18 saying, the Court will deem the motions for sanctions in these  
19 two cases submitted for ruling.

20 And thank you, Counsel. We're adjourned.

21 (Whereupon, the proceedings adjourned at 10:44 a.m.)

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**CERTIFICATE OF REPORTER**

I, Kim Marchwick, a Registered Professional Reporter and Certified Realtime Reporter, do hereby certify that the foregoing 47 pages of transcript is a true and correct record of the proceedings given at the time and place hereinbefore mentioned; that the proceedings were reported by me in machine shorthand and thereafter reduced to typewritten form using Computer-Aided Transcription; that after being reduced to typewritten form, a certified copy of this transcript will be filed electronically with the court.

I further certify that I am not an attorney for nor employed by, nor related to any of the parties or attorneys to this action, nor financially interested in this action.

Whereupon, this document was signed by me in Billings, Montana, this Friday, the 13th day of May, 2022.

*/s/ Kim Marchwick*

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